

# **Exhibit 1**

1 UNITED STATES DISTRICT COURT  
2 FOR THE NORTHERN DISTRICT OF OHIO  
3 EASTERN DIVISION

4 - - -

4 IN RE: NATIONAL )  
PRESCRIPTION ) MDL No. 2804  
5 OPIATE LITIGATION )  
 ) Case No.  
6 ) 1:17-MD-2804  
THIS DOCUMENT RELATES )  
7 TO ALL CASES ) Hon. Dan A. Polster

8 - - -

9 Tuesday, August 7, 2018

10 HIGHLY CONFIDENTIAL - SUBJECT TO FURTHER  
CONFIDENTIALITY REVIEW

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12  
13 Videotaped deposition of Jennifer R. Norris,  
14 held at the offices of BakerHostetler, 200 Civic Center  
15 Drive, Suite 1200, Columbus, Ohio, commencing at  
16 8:09 a.m., on the above date, before Carol A. Kirk,  
17 Registered Merit Reporter and Notary Public.

18 - - -

19  
20  
21  
22  
23 GOLKOW LITIGATION SERVICES  
877.370.3377 ph | 917.591.5672 fax  
24 deps@golkow.com

1 witness.

2 - - -

3 JENNIFER R. NORRIS

4 being by me first duly sworn, as hereinafter certified,  
5 deposes and says as follows:

6 CROSS-EXAMINATION

7 BY MR. FULLER:

8 Q. Ma'am, please state your name for the  
9 record.

10 A. Jennifer Robison Norris.

11 Q. And, Ms. Norris, where are you currently  
12 employed?

13 A. Cardinal Health.

14 Q. And how long have you been at Cardinal  
15 Health?

16 A. Eighteen years.

17 Q. And what is your current position at  
18 Cardinal?

19 A. I'm an attorney in the legal department.

20 Q. Do you have any particular title?

21 A. I do. I'm vice president, associate  
22 general counsel, mergers and acquisitions.

23 Q. I'm sorry. You said mergers and  
24 acquisitions, right?

1 A. Mm-hmm, and integration.

2 Q. And how long have you held that title?

3 A. I've been in that group -- my titles  
4 varied, but I've been in that group for  
5 approximately two years.

6 Q. And that's the mergers and acquisitions  
7 and integrations group?

8 A. Yes.

9 Q. How about prior to that?

10 A. Prior to that, I was still a vice  
11 president, associate general counsel, but I was in  
12 our commercial group supporting our pharmacy  
13 distribution business primarily.

14 Q. When you say supporting pharmacy  
15 distribution, give me an understanding of what you  
16 would be doing in that role.

17 A. My primary role was with acute care and  
18 alternate care customers, working on the customer  
19 facing agreements and issues that came up from  
20 time to time with those customers.

21 Q. Okay. And how about prior to that?

22 A. I've always been in that group. Again,  
23 my title has varied, and I've supported other  
24 groups within Cardinal Health. I supported

1 sourcing at one time. We had a corporate sales  
2 group, sold all of the products and services  
3 within Cardinal Health that I supported.

4 I supported our specialty pharmaceutical  
5 distribution business, our specialty services  
6 business, the 3PL, the third-party logistics  
7 business we have, as well as working on 340B and  
8 other matters within pharmacy distribution.

9 Q. I've seen 340B before. What's 340B?

10 A. It's a federally mandated essentially  
11 drug discount program for certain types of  
12 customers.

13 Q. Got it. Well, you have the pleasure or  
14 the curse of being designated today as a 30(b)  
15 witness. Are you aware of that?

16 A. I am.

17 Q. And do you understand what that means?

18 A. I do.

19 Q. That's because you're a lawyer, right?

20 MS. MAINIGI: Objection.

21 A. Because I'm a lawyer, and that's what I  
22 was asked to do.

23 Q. Sure.

24 A. I was not aware of what a 30(b)(6)

1 Q. Have you reviewed any of their  
2 testimony?

3 A. No, I have not.

4 Q. Okay. In preparation for this  
5 deposition, did you actually read this opinion?

6 A. I did.

7 Q. Okay. And let me ask you, how much time  
8 have you spent preparing for this deposition?

9 A. The last three and a half weeks from  
10 the -- beginning the -- Monday the 16th, I believe  
11 it was, through today.

12 Q. And I won't say 24 hours a day. Mainly  
13 your working hours of your day have been  
14 encompassed by preparing for this 30(b) notice --

15 A. Yes.

16 Q. -- or the notices, correct?

17 A. Yes. I'm sorry.

18 Q. Okay. And tell me -- again, other than  
19 counsel, who else have you spoken with related to  
20 the preparation for this 30(b) notice?

21 A. I spoke to a variety of individuals at  
22 Cardinal Health. I'll try to remember them all.  
23 Michael Mone, Todd Cameron, Gilberto Quintero.

24 Q. Hold -- slow down a little bit for me.

1 A. Sorry. Michael Mone.

2 Q. Mr. Cameron?

3 A. Todd Cameron.

4 Q. Roberto?

5 A. Gilberto Quintero.

6 Q. Yes, ma'am.

7 A. Danny Roberts.

8 Q. Yes, ma'am.

9 A. Linden Barber.

10 Q. Yes, ma'am.

11 A. Steve Reardon, Sean Callinicos.

12 Q. Spell the last name for me.

13 A. I believe it is C-a-l-l-i-n-c-o-s [sic]

14 or something to that effect.

15 Q. Fair enough. He'll forgive you.

16 A. Just one second. Let me try to

17 remember. I believe that's everybody. I believe

18 that's everyone. If I -- if somebody pops into my

19 brain, I will let you know.

20 Q. And who did you speak -- other than

21 counsel -- with about the Masters Pharmaceutical

22 case?

23 A. Todd Cameron and I -- Todd answered a

24 question regarding it.